

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

ZACHARIAH ROBERTSON, ANGEL
HERNANDEZ, GORDON LUNSTED,
GREG HUGGINS, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

ENBRIDGE (US) INC, CLEVELAND
INTEGRITY SERVICES, INC., and
CYPRESS ENVIRONMENTAL
MANAGEMENT-TIR, LLC

Defendants.

Civil Action No. 2:19-cv-01080-WSS-LPL

Judge William S. Stickman IV

Magistrate Judge Lisa Pupo Lenihan

**CLEVELAND INTEGRITY SERVICES, INC.'S AND CYPRESS ENVIRONMENTAL
MANAGEMENT-TIR, LLC'S MOTION FOR LEAVE TO FILE EXCESS PAGES**

Cleveland Integrity Services, Inc. ("CIS") and Cypress Environmental Management-TIR, LLC ("CEM-TIR") moves for leave to exceed page limits to file a joint motion to disqualify the law firms of Josephson Dunlap LLC ("Josephson Dunlap") and Bruckner Burch PLLC ("Bruckner Burch") as counsel in this matter. This filing totals forty pages, and is attached for the Court's reference. The filing involves significant factual development of the various unethical conduct at issue, including embedding screenshots of some of Josephson Dunlap's improper solicitations and advertising within the body of the memorandum of law for the Court's ease of review. Permitting excess pages to more fully develop the record is warranted in light of the movant's burden of producing evidence that Josephson Dunlap's and Bruckner Burch's

ongoing representation is impermissible. *See Wise v. Washington Cnty.*, Civil Action No. 10-1677, 2013 WL 5674460, at *4 (W.D. Pa. Oct. 17, 2013).

July 31, 2020

Respectfully submitted,

Cleveland Integrity Services, Inc and
Cypress Environmental Management-TIR, LLC

/s/ Rachel B. Cowen

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CERTIFICATE OF SERVICE

The undersigned does certify that on the 31st day of July 2020, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants.

/s/ Rachel B. Cowen
Rachel B. Cowen